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*Document Electronically Filed*

November 20, 2023

Hon. Andrew E. Krause  
United States Magistrate Judge  
United States District Court for the  
Southern District of New York  
Hon. Charles L. Brieant, Jr. Federal Building  
and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Guerrero v. Kijakazi, Acting Commissioner of Social Security  
Docket No: 7:23-cv-07586-AEK

Hon. Judge Krause:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to file Plaintiff's Brief in this matter, to January 23, 2024. Plaintiff's Brief is currently due on November 24, 2023; however, Plaintiff cannot complete the Brief on time.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between November 10, and January 12, 2023, staff in Counsel's office have one hundred and sixty-two (162) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to thoroughly and properly prepare the brief.

Plaintiff's counsel has contacted defense counsel who kindly consents to this request. This request will not cause Defendant any undue hardship. The parties have agreed on the below briefing schedule. This would be a first request for an extension of time in this matter.

If Plaintiff's request is granted, the new briefing schedule would be:

- **Plaintiff's Brief is due on or before January 23, 2024;**
- **Defendant's Brief is due on or before March 25, 2024; and**
- **Plaintiff's Reply Brief, if any, is due on or before April 8, 2024.**

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Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky  
Howard D. Olinsky, Esq.  
Counsel for Plaintiff

CC [via ECF]: Nahid Sorooshyari, Esq., Counsel for Defendant

**SO ORDERED.**

Dated: November 20, 2023

Andrew Kraus  
**U.S. Magistrate Judge**

The Court understands that the proposed revised schedule is the result of the parties' "good faith effort to agree upon a reasonable and comprehensive schedule for all future filings in the case," as contemplated by the Court's Standing Order, which has been issued in this case (ECF No. 4). The parties are hereby reminded that, in accordance with the Standing Order, no further extensions will be granted absent compelling circumstances.